

**PART 70 OPERATING PERMIT  
OFFICE OF AIR MANAGEMENT  
and  
Anderson Office of Air Management**

**ABC Railroad Products Corporation  
705 East School Street  
Anderson, Indiana 46012**

(herein known as the Permittee) is hereby authorized to operate a steel foundry subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T095-5982-00033	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

## TABLE OF CONTENTS

<b>A</b>	<b>SOURCE SUMMARY</b>	<b>4</b>
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	4
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]	4
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]	5
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	5
<b>B</b>	<b>GENERAL CONDITIONS</b>	<b>6</b>
B.1	Permit No Defense [326 IAC 2-1-10] [IC 13]	6
B.2	Definitions [326 IAC 2-7-1]	6
B.3	Permit Term [326 IAC 2-7-5(2)]	6
B.4	Enforceability [326 IAC 2-7-7(a)]	6
B.5	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	6
B.6	Severability [326 IAC 2-7-5(5)]	6
B.7	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	6
B.8	Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]	6
B.9	Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]	7
B.10	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]	7
B.11	Annual Compliance Certification [326 IAC 2-7-6(5)]	7
B.12	Preventive Maintenance Plan [326 IAC 2-7-5][326 IAC 2-7-6][326 IAC 1-6-3]	8
B.13	Emergency Provisions [326 IAC 2-7-16]	9
B.14	Permit Shield [326 IAC 2-7-15]	11
B.15	Multiple Exceedances [326 IAC 2-7-5(1)(E)]	12
B.16	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	12
B.17	Permit Modification, Reopening, Revocation and Reissuance, or Termination	13
B.18	Permit Renewal [326 IAC 2-7-4]	13
B.19	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	14
B.20	Permit Revision Under Economic Incentives and Other Programs	15
B.21	Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]	15
B.22	Operational Flexibility [326 IAC 2-7-20]	15
B.23	Construction Permit Requirement [326 IAC 2]	17
B.24	Inspection and Entry [326 IAC 2-7-6(2)]	17
B.25	Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]	17
B.26	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]	18
<b>C</b>	<b>SOURCE OPERATION CONDITIONS</b>	<b>19</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
C.1	Major Source	19
C.2	Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]	19
C.3	Opacity [326 IAC 5-1]	19
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	19
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	19
C.6	Fugitive Dust Emissions [326 IAC 6-4]	19
C.7	Operation of Equipment [326 IAC 2-7-6(6)]	19
C.8	Stack Height [326 IAC 1-7]	19
C.9	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]	20
	<b>Testing Requirements [326 IAC 2-7-6(1)]</b>	
C.10	Performance Testing [326 IAC 3-6]	21

<b>Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]</b>	
C.11	Compliance Schedule [326 IAC 2-7-6(3)] ..... 21
C.12	Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] ..... 21
C.13	Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)] ..... 22
C.14	Monitoring Methods [326 IAC 3] ..... 22
C.15	Pressure Gauge Specifications ..... 22
<b>Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]</b>	
C.16	Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3] ..... 22
C.17	Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215] ..... 23
C.18	Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] .... 24
C.19	Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] .. 25
<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
C.20	Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] 25
C.21	Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)] ..... 26
C.22	General Record Keeping Requirements [326 IAC 2-7-5(3)] ..... 26
C.23	General Reporting Requirements [326 IAC 2-7-5(3)(C)] ..... 27
<b>Stratospheric Ozone Protection</b>	
C.24	Compliance with 40 CFR 82 and 326 IAC 22-1 ..... 28
<b>D.1</b>	<b>FACILITY OPERATION CONDITIONS -Emission units BH-1 through BH-8 ..... 29</b>
<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
D.1.1	Particulate Matter (PM) [326 IAC 6-3-2(c)] ..... 29
D.1.2	Preventive Maintenance Plan [326 IAC 2-7-5(13)] ..... 30
<b>Compliance Determination Requirements</b>	
D.1.3	Testing Requirements [326 IAC 2-7-6(1),(6)] ..... 31
D.1.4	Particulate Matter (PM) ..... 31
<b>Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]</b>	
D.1.5	Visible Emissions Notations ..... 31
D.1.6	Baghouse Inspections ..... 31
D.1.7	Broken or Failed Bag Detection ..... 32
D.1.8	Parametric Monitoring ..... 32
<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b>	
D.1.9	Record Keeping Requirements ..... 32
<b>D.2</b>	<b>FACILITY OPERATION CONDITIONS - Regulated Insignificant Emission Units ..... 34</b>
<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
D.2.1	Particulate Matter (PM) [326 IAC 6-3-2(c)] ..... 34
<b>Compliance Determination Requirements</b>	
D.2.2	Testing Requirements [326 IAC 2-7-6(1),(6)] ..... 34
<b>Certification Form ..... 35</b>	
<b>Emergency/Deviation Occurrence Report ..... 36</b>	
<b>Compliance Monitoring Report Form ..... 38</b>	

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Anderson Office of Air Management. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary steel foundry that manufactures track components.

Responsible Official: D. Chisholm McDonald  
Source Address: 705 East School Street, Anderson, Indiana 46012  
Mailing Address: 705 East School Street, Anderson, Indiana 46012  
Phone Number: 765-642-4991  
SIC Code: 3325  
County Location: Madison  
County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program  
Major Source, under PSD  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) grinding and cutting booth, identified as BH-1, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-1.
- (b) One (1) sand reclamation, identified as BH-3, with a maximum capacity of 8 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-3.
- (c) One (1) shakeout machine, identified as BH-4, with a maximum capacity of 2.3 tons of casting per hour, using a baghouse as control equipment, and exhausting to stack BH-4.
- (d) One (1) sand storage, identified as BH-5, with a maximum capacity of 8 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-5.
- (e) One (1) sand cooling, identified as BH-6, with a maximum capacity of 8 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-6.
- (f) One (1) electric arc furnace, identified as BH-7, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-7.
- (g) One (1) shot blasting machine, identified as BH-8, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-8.
- (h) Charge handling operations, identified as F-1, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-1.
- (I) Molding "Burn in" operations, identified as F-4, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-4.

- (j) Pouring and Casting operations, identified as F-5, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-5.
- (k) Casting cooling operations, identified as F-6, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-6.
- (l) Floor shakeout operations, identified as F-7, with a maximum capacity of 0.8 tons per hour, with no control equipment, and exhausting through stack F-7.
- (m) Heat treat oven operations, identified as F-8, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-8.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

---

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) One (1) Riser cut-off booth, identified as BH-2, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-2.
- (b) Core Making operations, identified as F-2, with a maximum capacity of 7680 pounds per day, with no control equipment, and exhausting through stack F-2.
- (c) Mold Filling operations, identified as F-3, with a maximum capacity of 7680 pounds per day, with no control equipment, and exhausting through stack F-3.
- (d) Pattern Shop operations, identified as C-1, with occasional work to correct the damaged molds, using a cyclone as control equipment with a maximum air flow of 2,500 acfm, and exhausting through stack C-1.
- (e) Planers and Final Finish operations, identified as F-9, with a maximum capacity of 72 tons per day, with no control equipment, and exhausting through stack F-9.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

---

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

B.1	<p>Permit No Defense [326 IAC 2-1-10] [IC 13]</p> <p>(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.</p> <p>(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."</p>
B.2	<p>Definitions [326 IAC 2-7-1]</p> <p>Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.</p>
B.3	<p>Permit Term [326 IAC 2-7-5(2)]</p> <p>This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.</p>
B.4	<p>Enforceability [326 IAC 2-7-7(a)]</p> <p>(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and Anderson Office of Air Management.</p> <p>(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.</p> <p>(c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Anderson Office of Air Management.</p>
B.5	<p>Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]</p> <p>The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).</p>
B.6	<p>Severability [326 IAC 2-7-5(5)]</p> <p>The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.</p>
B.7	<p>Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]</p> <p>This permit does not convey any property rights of any sort, or any exclusive privilege.</p>
B.8	<p>Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]</p> <p>(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:</p>

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

- (b) The Permittee shall furnish to IDEM, OAM, and Anderson Office of Air Management within a reasonable time, any information that IDEM, OAM, and Anderson Office of Air Management may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and Anderson Office of Air Management copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and Anderson Office of Air Management along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

---

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015,

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Anderson Office of Air Management on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3)
  - (5) Any insignificant activity that has been added without a permit revision; and
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and Anderson Office of Air Management, may require to determine the compliance status of the source.

The submittals by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).



**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]**  
**[326 IAC 1-6-3]**

---

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

in writing, prior to the end of the ninetieth (90th) day, with full justification of the reasons for the inability to meet this date, certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and Anderson Office of Air Management upon request and shall be subject to review and approval by IDEM, OAM, and Anderson Office of Air Management.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

---

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and Anderson Office of Air Management within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967, or

Telephone Number: 765-648-6158 (Anderson Office of Air Management)  
Facsimile Number: 765-648-5924

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015, and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency

or upset provision contained in any applicable requirement.

- (e) IDEM, OAM or Anderson Office of Air Management may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, or Anderson Office of Air Management by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

---

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and Anderson Office of Air Management shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and Anderson Office of Air Management has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and Anderson Office of Air Management has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and Anderson Office of Air Management determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions of a Part 70 permit.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, and Anderson Office of Air Management to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, and Anderson Office of Air Management at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and Anderson Office of Air Management may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and Anderson Office of Air Management and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Anderson Office of Air Management on or before the date it is due.

- (2) If IDEM, OAM, and Anderson Office of Air Management, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, and Anderson Office of Air Management takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, and Anderson Office of Air Management, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, and Anderson Office of Air Management, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
and  
  
Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018  
  
Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(I) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, and Anderson Office of Air Management in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:



- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9) without a prior permit revision, subject to compliance with the permit terms and conditions. No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, and Anderson Office of Air Management, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and Anderson Office of Air Management or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and Anderson Office of Air Management nor an authorized representative, may disclose the information unless and until IDEM, OAM, and Anderson Office of Air Management makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, IDEM, OAM, and Anderson Office of Air Management acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25 Transfer of Ownership or Operation [326 IAC 2-7-11]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

- (a) The Permittee shall pay annual fees to IDEM, OAM, and Anderson Office of Air Management, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM or Anderson Office of Air Management, the applicable fee is due April 1 of each year.

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
---------------

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

#### C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

#### C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.7 Operation of Equipment [326 IAC 2-7-6(6)]**

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.8 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.10 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM and Anderson Office of Air Management within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation with five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

**C.11 Compliance Schedule [326 IAC 2-7-6(3)]**

---

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

**C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

---

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

in writing, prior to the end of the ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

---

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.14 Monitoring Methods [326 IAC 3]**

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed, according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**C.15 Pressure Gauge Specifications**

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (  $\pm 2\%$  ) of full scale reading.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, and Anderson Office of Air Management the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAM, and Anderson Office of Air Management, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

---

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, and Anderson Office of Air Management that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and Anderson Office of Air Management that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

---

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and Anderson Office of Air Management upon request and shall be subject to review and approval by IDEM, OAM, and Anderson Office of Air Management. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :



- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

---

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Anderson Office of Air Management on or before the date it is due.

C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and Anderson Office of Air Management may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and Anderson Office of Air Management representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Anderson Office of Air Management makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Anderson Office of Air Management within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;

- (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
and  
  
Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Anderson Office of Air Management on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

### **Stratospheric Ozone Protection**

#### **C.24 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) grinding and cutting booth, identified as BH-1, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-1.
- (b) One (1) sand reclamation, identified as BH-3, with a maximum capacity of 8 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-3.
- (c) One (1) shakeout machine, identified as BH-4, with a maximum capacity of 2.3 tons of casting per hour, using a baghouse as control equipment, and exhausting to stack BH-4.
- (d) One (1) sand storage, identified as BH-5, with a maximum capacity of 8 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-5.
- (e) One (1) sand cooling, identified as BH-6, with a maximum capacity of 8 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-6.
- (f) One (1) electric arc furnace, identified as BH-7, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-7.
- (g) One (1) shot blasting machine, identified as BH-8, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-8.
- (h) Charge handling operations, identified as F-1, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-1.
- (i) Molding "Burn in" operations, identified as F-4, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-4.
- (j) Pouring and Casting operations, identified as F-5, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-5.
- (k) Casting cooling operations, identified as F-6, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-6.
- (l) Floor shakeout operations, identified as F-7, with a maximum capacity of 0.8 tons per hour, with no control equipment, and exhausting through stack F-7.
- (m) Heat treat oven operations, identified as F-8, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-8.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3, the allowable PM emission rate from:

- (a) the grinding and cutting booth, identified as BH-1, shall not exceed 8.6 pound per hour when operating at a process weight rate of 3.0 tons per hour.

- (b) the sand reclamation, identified as BH-3, shall not exceed 16.5 pound per hour when operating at a process weight rate of 8.0 tons per hour.
- (c) the shakeout machine, identified as BH-4, shall not exceed 7.1 pound per hour when operating at a process weight rate of 2.3 tons per hour
- (d) the sand storage, identified as BH-5, shall not exceed 16.5 pound per hour when operating at a process weight rate of 8.0 tons per hour
- (e) the sand cooling, identified as BH-6, shall not exceed 16.5 pound per hour when operating at a process weight rate of 8.0 tons per hour
- (f) the electric arc furnace, identified as BH-7, shall not exceed 8.6 pound per hour when operating at a process weight rate of 3.0 tons per hour
- (g) the shot blasting machine, identified as BH-8, shall not exceed 8.6 pound per hour when operating at a process weight rate of 3.0 tons per hour
- (h) the charge handling operations, identified as F-1, shall not exceed 8.6 pound per hour when operating at a process weight rate of 3.0 tons per hour
- (i) the mold "burn in" operations, identified as F-4, shall not exceed 8.6 pound per hour when operating at a process weight rate of 3.0 tons per hour
- (j) the pouring and casting operations, identified as F-5, shall not exceed 8.6 pound per hour when operating at a process weight rate of 3.0 tons per hour
- (k) the casting cooling operations, identified as F-6, shall not exceed 8.6 pound per hour when operating at a process weight rate of 3.0 tons per hour
- (l) the floor shakeout operations, identified as F-7, shall not exceed 3.4 pound per hour when operating at a process weight rate of 0.8 tons per hour
- (m) the heat treat ovens, identified as F-1, shall not exceed 8.6 pound per hour when operating at a process weight rate of 3.0 tons per hour

The pound per hour emission rate for the units (a) through (g) was established using the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the following equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices

## **Compliance Determination Requirements**

### **D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**

---

- a) During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM and PM-10 testing for the electric arc furnace BH-7, utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10 or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.
- b) Except for the electric arc furnace BH-7, the Permittee is not required to test the rest of the facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if any of the facilities are in compliance. If testing is required by IDEM, or Anderson Office of Air Management, compliance with the PM and PM10 limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### **D.1.4 Particulate Matter (PM)**

---

The baghouse for PM control shall be in operation at all times when the facilities BH-1, BH3 through BH-8 are in operation.

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.1.5 Visible Emissions Notations**

---

- (a) Daily visible emission notations of each of the facility stacks exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

### **D.1.6 Baggouse Inspections**

---

An inspection shall be performed each calender quarter of all bags controlling the following operations:

- (a) the grinding and cutting booth, identified as BH-1
- (b) the sand reclamation, identified as BH-3



- (c) the shakeout machine, identified as BH-4
- (d) the electric arc furnace, identified as BH-7
- (e) the shot blasting machine, identified as BH-8

A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### **D.1.7 Broken or Failed Bag Detection**

---

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### **D.1.8 Parametric Monitoring**

---

The Permittee shall record the total static pressure drop across each of the baghouses BH-1, BH-3, BH-4, BH-7, and BH-8 used in conjunction with the associated processes, once daily when the processes controlled by these baghouses are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and Anderson Office of Air Management and shall be calibrated at least once every six (6) months.

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.9 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations for each of the following stack exhausts: BH-1, BH-3, BH-4, BH-7, and BH-8.

- (b) To document compliance with Conditions D.1.7 and D.1.8 the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all response steps implemented, per event .
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
  - (8) Documentation of the dates vents are redirected.
  - (9) Records of the baghouse inspections.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of the inspections required under Condition D.1.5.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

- (a) One (1) Riser cut-off booth, identified as BH-2, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-2.
- (b) Core Making operations, identified as F-2, with a maximum capacity of 7680 pounds per day, with no control equipment, and exhausting through stack F-2.
- (c) Mold Filling operations, identified as F-3, with a maximum capacity of 7680 pounds per day, with no control equipment, and exhausting through stack F-3.
- (d) Pattern Shop operations, identified as C-1, with occasional work to correct the damaged molds, using a cyclone as control equipment with a maximum air flow of 2,500 acfm, and exhausting through stack C-1.
- (e) Planers and Final Finish operations, identified as F-9, with a maximum capacity of 72 tons per day, with no control equipment, and exhausting through stack F-9.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from these facilities shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### Compliance Determination Requirement

#### D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, or Anderson Office of Air Management, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

State Form 47738 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR MANAGEMENT and**  
**Anderson Office of Air Management**  
**COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: ABC Rail Products Corporation  
Source Address: 705 East School Street, Anderson, Indiana 46012  
Mailing Address: 705 East School Street, Anderson, Indiana 46012  
Part 70 Permit No.: T095-5982-00033

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Emergency/Deviation Occurrence Reporting Form
- ☐ Test Result (specify) \_\_\_\_\_
- ☐ Report (specify) \_\_\_\_\_
- ☐ Notification (specify) \_\_\_\_\_
- ☐ Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

State Form 47739 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-6865  
and  
Anderson Office of Air Management  
120 E 8th Street, Anderson, Indiana, 46018**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: ABC Rail Products Corporation  
Source Address: 705 East School Street, Anderson, Indiana 46012  
Mailing Address: 705 East School Street, Anderson, Indiana 46012  
Part 70 Permit No.: T095-5982-00033

**This form consists of 2 pages  
of 2**

**Page 1**

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report. State Form 47738 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT and  
Anderson Office of Air Management  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: ABC Rail Products Corporation  
Source Address: 705 East School Street, Anderson, Indiana 46012  
Mailing Address: 705 East School Street, Anderson, Indiana 46012  
Part 70 Permit No.: T095-5982-00033

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

**LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:**

<b>Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of</b> <b>Deviations</b>	<b>Date of each</b> <b>Deviations</b>	<b>No</b> <b>Deviations</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Management and  
Anderson Office of Air Management**

**Technical Support Document (TSD) for a Part 70 Operating Permit**

**Source Background and Description**

**Source Name:** ABC Rail Products Corporation  
**Source Location:** 705 East School Street, Anderson, Indiana 46012  
**County:** Madison  
**SIC Code:** 3325  
**Operation Permit No.:** T095-5982-00033  
**Permit Reviewer:** Keramida/VS

The Office of Air Management (OAM) has reviewed a Part 70 permit application from ABC Rail Products Corporation relating to the operation of a steel foundry that manufactures track components.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) grinding and cutting booth, identified as BH-1, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-1.
- (b) One (1) sand reclamation, identified as BH-3, with a maximum capacity of 8 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-3.
- (c) One (1) shakeout machine, identified as BH-4, with a maximum capacity of 2.3 tons of casting per hour, using a baghouse as control equipment, and exhausting to stack BH-4.
- (d) One (1) sand storage, identified as BH-5, with a maximum capacity of 8 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-5.
- (e) One (1) sand cooling, identified as BH-6, with a maximum capacity of 8 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-6.
- (f) One (1) electric arc furnace, identified as BH-7, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-7.
- (g) One (1) shot blasting machine, identified as BH-8, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-8.
- (h) Charge handling operations, identified as F-1, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-1.
- (i) Molding "Burn in" operations, identified as F-4, with a maximum capacity of 3.0 tons per day, with no control equipment, and exhausting through stack F-4.



- (j) Pouring and Casting operations, identified as F-5, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-5.
- (k) Casting cooling operations, identified as F-6, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-6.
- (l) Floor shakeout operations, identified as F-7, with a maximum capacity of 0.8 tons per hour, with no control equipment, and exhausting through stack F-7.
- (m) Heat treat oven operations, identified as F-8, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-8.

### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

### **Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)**

There are no new facilities to be reviewed under the ENSR process.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Space heaters, process heaters, or boilers using the following fuels.
  - (a) Natural gas-fired Heat Treating Ovens with each heat input equal to or less than ten million (10,000,000) Btu per hour identified all together as F-8.
  - (b) Natural gas-fired space heaters and Ladle heaters with each heat input equal to or less than ten million (10,000,000) Btu per hour identified all together as F-11.
- (2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (3) The following VOC and HAP storage containers:
  - (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  - (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (4) Refractory storage not requiring air pollution control equipment.
- (5) Quenching operations used with heat treating processes.
- (6) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (7) Paved and unpaved roads and parking lots with public access.

- (8) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (9) Flue gas conditioning systems and associated chemicals such as the following: sodium sulfate; ammonia; and sulfur trioxide.
- (10) Other activities or categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only.

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day

Carbon Monoxide (CO) - 25 lbs/day

Sulfur Dioxide (SO<sub>2</sub>) = 5 lbs/hour or 25 lbs/day

Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day

Nitrogen Oxides (NO<sub>x</sub>) = 5 lbs/hour or 25 lbs/day

Volatile Organic Compounds (VOC) = 3 lbs/hour or 15 lbs/day

- (a) One (1) Riser cut-off booth, identified as BH-2, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-2.
- (b) Core Making operations, identified as F-2, with a maximum capacity of 7680 pounds per day, with no control equipment, and exhausting through stack F-2.
- (c) Mold Filling operations, identified as F-3, with a maximum capacity of 7680 pounds per day, with no control equipment, and exhausting through stack F-3.
- (d) Pattern Shop operations, identified as C-1, with occasional work to correct the damaged molds, using a cyclone as control equipment with a maximum air flow of 2,500 acfm, and exhausting through stack C-1.
- (e) Planers and Final Finish operations, identified as F-9, with a maximum capacity of 72 tons per day, with no control equipment, and exhausting through stack F-9.

### Existing Approvals

The source has been operating under the following approvals:

- (1) 1995 Certificate to operate # 3001 issued by Anderson Office of Air Management, for emission point BH-1
- (2) 1995 Certificate to operate # 3002 issued by Anderson Office of Air Management, for emission point BH-2
- (3) 1995 Certificate to operate # 3003 issued by Anderson Office of Air Management, for emission point BH-3
- (4) 1995 Certificate to operate # 3004 issued by Anderson Office of Air Management, for emission point BH-4
- (5) 1995 Certificate to operate # 3005 issued by Anderson Office of Air Management, for emission point BH-5

- (6) 1995 Certificate to operate # 3006 issued by Anderson Office of Air Management, for emission point BH-6
- (7) 1995 Certificate to operate # 3007 issued by Anderson Office of Air Management, for emission point BH-7
- (8) 1995 Certificate to operate # 3008 issued by Anderson Office of Air Management, for emission point BH-8

All conditions from previous approvals were incorporated into this Part 70 permit.

### Enforcement Issue

There are no Enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on May 31, 1996.

A notice of completeness letter was mailed to the source on February 19, 1997.

### Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM-10	greater than 250
SO <sub>2</sub>	less than 100
VOC	less than 100
CO	less than 100
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Manganese Compounds	greater than 10
Benzene	Less than 10
Formaldehyde	Less than 10
Xylene	Less than 10

Phenol	Less than 10
Toluene	Less than 10
Naphtalene	Less than 10
Acrolein	Less than 10
TOTAL	Less than 25

- (a) The potential emissions (as defined in the Indiana Rule) of PM<sub>10</sub> are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP are equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is one of the 28 listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) emissions are counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1995 emission data submitted to IDEM.

Pollutant	Actual Emissions (tons/year)
PM	156
PM-10	156
SO <sub>2</sub>	-
VOC	-
CO	-
HAP (specify)	N/A
NO <sub>x</sub>	-

### Limited Potential to Emit

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
BH-1	37.7	37.7	-	-	-	-	-
BH-3	72.3	72.3	-	-	-	-	-
BH-4	31.1	31.1	-	-	-	-	-
BH-7	37.7	37.7	-	-	-	-	-
BH-8	193.6	193.6	-	-	-	-	-
F-5	37.7	37.7	-	-	-	-	-

Total Emissions	410.1	410.1	-	-	-	-	-
-----------------	-------	-------	---	---	---	---	---

The values in the above table represent the maximum allowable PM emissions based on 326 IAC 6-3-2. The uncontrolled potential emissions are presented in Appendix A, along with the allowable emissions.

### County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as attainment or unclassifiable for ozone.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12) 40 CFR Part 60 applicable to this source.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 2-2 Prevention of Significant Deterioration (PSD)

This type of operation is one of the 28 listed source categories under 326 IAC 2-2 and the permitted facility has actual emissions greater than 100 tons of PM and PM<sub>10</sub>. This source did not undergo PSD review because no increase in the potential to emit over the significant increments occurred after the promulgation of the PSD rule in 1977.

However the source received from the Anderson Office of Air Management operating permits only for the emission units controlled by baghouses. A letter attached to the permit application explained the situation. The emission units not covered in the Anderson Office of Air Management permits should not be considered new sources and should not undergo PSD review. Any new modification resulting in the increase over the significant increments will be subject to PSD review.

#### 326 IAC 2-6 Emission Reporting

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of particulate matter. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 Visible Emissions Limitations

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

#### **State Rule Applicability - Individual facilities**

##### 326 IAC 6-3-2

- (a) The particulate matter (PM) emissions from the grinding and cutting booth, identified as BH-1 and exhausting to stack BH-1, shall not exceed 8.6 pound per hour when operating at the maximum process weight rate of 3.0 tons per hour. Since the potential PM emissions before controls from this emission source are 51 lb/hr, the unit will comply with this rule by using a baghouse with minimum 83.2% control efficiency. Details are presented in Appendix A.
- (b) The particulate matter (PM) emissions from the sand reclamation, identified as BH-3, with a maximum capacity of 8 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-3, will be limited to 16.5 lb/hr. Since the potential PM emissions before control from this emission source are 28.8 lb/hr, the unit will comply with this rule using a baghouse with minimum 42.7% efficiency. Details are presented in Appendix A.
- (c) The particulate matter (PM) emissions from the shakeout machine, identified as BH-4, with a maximum capacity of 2.3 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-4, will be limited to 7.1 lb/hr. Since the potential PM emissions before control from this emission source are 59.0 lb/hr, the unit will comply with this rule using a baghouse with minimum 88.0% control efficiency. Details are presented in Appendix A.

- (d) The particulate matter (PM) emissions from the sand storage operations, identified as BH-5, with a maximum capacity of 8 tons of sand per hour, using a baghouse as control equipment, and exhausting to stack BH-5, will be limited to 16.5 lb/hr. Since the potential PM emissions from this emission source are 4.3 lb/hr, the unit will comply with this rule without using the baghouse. Details are presented in Appendix A.
- (e) The particulate matter (PM) emissions from the sand cooling operations, identified as BH-6, with a maximum capacity of 8 tons of sand per hour, using a baghouse as control equipment, and exhausting to stack BH-6, will be limited to 16.5 lb/hr. Since the potential PM emissions from this emission source are 4.3 lb/hr, the unit will comply with this rule without using the baghouse. Details are presented in Appendix A.
- (f) The particulate matter (PM) emissions from the electric arc furnace, identified as BH-7, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-7, will be limited to 8.6 lb/hr. Since the potential PM emissions before controls from this emission source are 39.0 lb/hr, the unit will comply with this rule using a baghouse with minimum 78.1% control efficiency. Details are presented in Appendix A.
- (g) The particulate matter (PM) emissions from the shot blasting machine, identified as BH-8, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-8, will be limited to 8.6 lb/hr. Since the potential PM emissions before controls from this emission source are 51.0 lb/hr, the unit will comply with this rule using a baghouse with minimum 83.2% control efficiency. Details are presented in Appendix A.
- (h) The particulate matter (PM) emissions from the charge handling operations, identified as F-1, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-1, will be limited to 8.6 lb/hr. Since the potential PM emissions from this emission source are 1.8 lb/hr, the unit will comply with this rule without using the baghouse. Details are presented in Appendix A.
- (i) The particulate matter (PM) emissions from the mold "burn in" operations, identified as F-4, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-4, will be limited to 8.6 lb/hr. Since the potential PM emissions from this emission source are 3.3 lb/hr, the unit will comply with this rule without using the baghouse. Details are presented in Appendix A.
- (j) The particulate matter (PM) emissions from the Pouring and Casting operations, identified as F-5, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-5, will be limited to 8.6 lb/hr. Since the potential PM emissions from this emission source are 8.4 lb/hr, the unit will comply with this rule without using the baghouse. Details are presented in Appendix A.
- (k) The particulate matter (PM) emissions from the casting cooling operations, identified as F-6, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-6, will be limited to 8.6 lb/hr. Since the potential PM emissions from this emission source are 4.2 lb/hr, the unit will comply with this rule without using the baghouse. Details are presented in Appendix A.

- (l) The particulate matter (PM) emissions from the floor shakeout operations, identified as F-7, with a maximum capacity of 0.8 tons per hour, with no control equipment, and exhausting through stack F-7, will be limited to 3.4 lb/hr. Since the potential PM emissions from this emission source are 2.4 lb/hr, the unit will comply with this rule without using the baghouse. Details are presented in Appendix A.
- (m) The particulate matter (PM) emissions from the heat transfer oven operations, identified as F-8, with a maximum capacity of 3.0 tons per hour, with no control equipment, and exhausting through stack F-8, will be limited to 8.6 lb/hr. Since the potential PM emissions from this emission source are 6.6 lb/hr, the unit will comply with this rule without using the baghouse. Details are presented in Appendix A.

Also, 326 IAC 6-3-2 applies to the following insignificant activities:

- (a) One (1) Riser cut-off booth, identified as BH-2, with a maximum capacity of 3.0 tons per hour, using a baghouse as control equipment, and exhausting to stack BH-2. The particulate matter (PM) emissions from this unit will limited to 8.6 lb/hr.
- (b) Core Making operations, identified as F-2, with a maximum capacity of 7680 pounds per day, with no control equipment, and exhausting through stack F-2. The particulate matter (PM) emissions from this unit will limited to 1.2 lb/hr.
- (c) Mold Filling operations, identified as F-3, with a maximum capacity of 7680 pounds per day, with no control equipment, and exhausting through stack F-3. The particulate matter (PM) emissions from this unit will limited to 1.2 lb/hr.
- (d) Pattern Shop operations, identified as C-1, with occasional work to correct the damaged molds, using a cyclone as control equipment with a maximum air flow of 2,500 acfm, and exhausting through stack C-1.
- (e) Planers and Final Finish operations, identified as F-9, with a maximum capacity of 3 tons per hour, with no control equipment, and exhausting through stack F-9. The particulate matter (PM) emissions from this unit will limited to 8.6 lb/hr.

The pound per hour emission rate for the units (a) through (g) was established using the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour;}$$

and

$$P = \text{process weight rate in tons per hour}$$

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

Visible Emissions Notations for the following emission units:

- one (1) grinding and cutting booth, identified as BH-1 and exhausting to stack BH-1;
- one (1) sand reclamation, identified as BH-3, and exhausting to stack BH-3;
- one (1) shakeout machine, identified as BH-4, and exhausting to stack BH-4;
- one (1) sand storage, identified as BH-5, and exhausting to stack BH-5;
- one (1) sand cooling, identified as BH-6, and exhausting to stack BH-6;



one (1) electric arc furnace, identified as BH-7, and exhausting to stack BH-7;  
one (1) shot blasting machine, identified as BH-8, and exhausting to stack BH-8;  
charge handling operations, identified as F-1, and exhausting through stack F-1;  
molding "Burn in" operations, identified as F-4, and exhausting through stack F-4;  
pouring and casting operations, identified as F-5, and exhausting through stack F-5;  
casting cooling operations, identified as F-6, and exhausting through stack F-6;  
floor shakeout operations, identified as F-7, and exhausting through stack F-7;  
heat treat oven operations, identified as F-8, and exhausting through stack F-8;

- (a) Daily visible emission notations of the stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### Parametric Monitoring

The Permittee shall record the total static pressure drop across each of the baghouses BH-1 through BH-8 used in conjunction with the associated processes, daily when the processes controlled by these baghouses are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and Anderson Office of Air Management and shall be calibrated at least once every six (6) months.

#### Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Preventive Maintenance Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Preventive Maintenance Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.

### **Conclusion**

The operation of this steel foundry shall be subject to the conditions of the attached proposed **Part 70 Permit No. T095-5982-00033**.

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for Part 70 Operating Permit

**Source Name:** ABC Railroad Products Corporation  
**Source Location:** 705 East School Street  
**County:** Madison  
**SIC Code:** 3325  
**Operation Permit No.:** T095-5982-00033  
**Permit Reviewer:** Keramida/VS

On October 26, 1998, the Office of Air Management (OAM) had a notice published in the Herald Bulletin, Anderson, Indiana, stating that ABC Railroad Products Corporation had applied for a Part 70 Operating Permit relating to the operation of a steel foundry that manufactures track components. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

#### SOURCE COMMENTS

On November 24, 1998, Jones, Day, Reavis & Pogue submitted comments on the proposed Part 70 permit on behalf of ABC Railroad Products Corporation. The summary of the comments is as follows:

##### **Comment 1:**

It is requested that Condition B.1 (a) be modified as follows (bold language should be added, language with a line through it should be removed):

##### **B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]**

---

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7, **and except as provided in Section B.1(b)**,
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

##### **Response to Comment 1:**

The modification requested in B.1 (a) is redundant to B.1 (b) which specifically states "shall not apply". This is the same exemption requested by the Source. Therefore, no changes have been made as a result of this comment.

##### **Comment 2:**

It is requested that Condition B.2 be modified as follows (bold language should be added, language with a line through it should be removed):

##### **B.2 Definitions [326 IAC 2-7-1]**

---

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. ~~In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.~~

**Response to Comment 2:**

Justification for the removal of the wording in Condition B.2 was not provided and deleting this condition will create confusion on where to look for definitions of terms. Therefore, no changes have been made.

**Comment 3:**

It is requested that Condition B.4 be modified as follows (bold language should be added, language with a line through it should be removed):

**B.4 Enforceability [326 IAC 2-7-7(a)]**

---

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and Anderson Office of Air Management **to the extent permitted by applicable law.**
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act **to the extent permitted by applicable law.**
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Anderson Office of Air Management **to the extent permitted by applicable law.**

**Response to Comment 3:**

IDEM does not have the authority nor the intention to enforce non-applicable laws. The condition stated in B.4 is directly taken from the rule. Therefore, no changes have been made as a result of this comment.

**Comment 4:**

It is requested that Condition B.9 (a) be modified as follows (bold language should be added, language with a line through it should be removed):

**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

---

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and **is may be** grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.

**Response to Comment 4:**

326 IAC 2-7-5(6)(A) requires that the permit contain a provision stating the permittee must comply with all conditions of the Part 70 permit. Any Part 70 permit noncompliance constitutes a violation of the CAA and is grounds for enforcement and other actions. No change was made as a result of this comment.

**Comment 5:**

It is requested that Condition B.13 (b) (5) and B.13(e) be modified as follows (bold language should be added, language with a line through it should be removed):

**B.13 Emergency Provisions [326 IAC 2-7-16]**

---

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and Anderson Office of Air Management within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967, or

Telephone Number: 765-648-6158 (Anderson Office of Air Management)  
Facsimile Number: 765-648-5924

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015, and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) **and 326 IAC 2-7-16** and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (e) IDEM, OAM or Anderson Office of Air Management may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) **and 326 IAC 1-6-3** be revised in response to an emergency.

**Response to Comment 5:**

The language found in Conditions B.13 (b) (5) and B.13 (e) was taken from 326 IAC 2-7-16 and it has been determined that the addition of the rule cites requested is not necessary. No changes to the final permit were made as a result of these comments.

**Comment 6:**

It is requested that Condition B.14 (c) be modified as follows (bold language should be added, language with a line through it should be removed):

**B.14 Permit Shield [326 IAC 2-7-15]**

- 
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement ~~that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit,~~ IDEM, OAM, and Anderson Office of Air Management shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

**Response to Comment 6:**

This condition is almost exactly the wording required by 326 IAC 2-7-15. 40 CFR 70.6(f) states that the permitting authority may expressly include in a Part 70 permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements. On July 28, 1998, the OAM was notified that the U.S. EPA would object to any Title V Operating Permit that superseded all previous construction permits. The U.S. EPA indicated that they believed that the authority for certain applicable requirements might expire if the construction permits that established them expired. The OAM believes that the regulatory process is best served if all affected parties are able to rely on the Title V Operating Permit to identify all applicable requirements and the means for demonstrating compliance with each requirement.

The OAM intends to continue discussions with the U.S. EPA regarding the issues related to past construction permits. However the OAM also believes that the Permit Shield condition B.14 (b) (1) & (2) establishes that the Title V permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of the permit shall be deemed in compliance with any applicable requirements as of the date of the permit issuance for all the previous permits identified by the source and the OAM during the course of this review.

No changes have been made as a result of this comment.

**Comment 7:**

It is requested that Condition B.17 (b) (2) be modified as follows (bold language should be added, language with a line through it should be removed):

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
**[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- 
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and Anderson Office of Air Management determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions **of the permit**.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

**Response to Comment 7:**

Condition B.17(b)(2) has been changed as follows to match the exact wording of the rule found in 326 IAC 2-7-9:

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and Anderson Office of Air Management determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions **of a Part 70 permit**.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

**Comment 8:**

It is requested that Condition B.21 be modified as follows (bold language should be added, language with a line through it should be removed):

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act** [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the ~~constraint~~ **provisions** of 326 IAC 2-7-20(a) and the following additional conditions:

**Response to Comment 8:**

The language found in Condition B.21 was taken from 326 IAC 2-7-20(b). No changes to the final permit were made as a result of this comment.

**Comment 9:**

It is requested that Condition B.22 (a) (4) be modified as follows (bold language should be added, language with a line through it should be removed):

**B.22 Operational Flexibility** [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee **and Commissioner** shall attach every such notice to the Permittee's copy of this permit; and

**Response to Comment 9:**

The Permittee is responsible for attaching the notice to the Permittee's copy of the permit. Therefore no changes have been made as a result of this comment.

**Comment 10:**

It is requested that Condition B.22 (d) be modified as follows (bold language should be added, language with a line through it should be removed):

**B.22 Operational Flexibility [326 IAC 2-7-20]**

**(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]**

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9) **without a prior permit revision, subject to compliance with the permit terms and conditions**. No prior notification of IDEM, OAM, or U.S. EPA is required.

**Response to Comment 10:**

The suggested change has been made in the final permit.

**Comment 11:**

It is requested that Condition B.24 and B.24 (d) be modified as follows (bold language should be added, language with a line through it should be removed):

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, and Anderson Office of Air Management, U.S. EPA, or ~~an~~ **their** authorized representatives to perform the following **to the extent permitted by applicable law**:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;



- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) **As authorized by applicable law s**Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

**Response to Comment 11:**

IDEM does not have the authority nor the intention to enforce non-applicable laws. Therefore, no changes have been made as a result of this comment.

**Comment 12:**

It is requested that Condition B.25 (a) be modified as follows (bold language should be added, language with a line through it should be removed):

**B.25** Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]  
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and Anderson Office of Air Management, within thirty (30) days of the change. Notification shall include ~~a written agreement containing~~ a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

**Response to Comment 12:**

IDEM has determined that the additional language is not necessary. No changes have been made as a result of this comment.

**Comment 13:**

It is requested that Condition B.26 (a) be modified as follows (bold language should be added, language with a line through it should be removed):

**B.26** Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) **Subject to the provisions of 326 IAC 2-7-19 regarding fee proration and 326 IAC 2-7-5(7) regarding payment in installment**, the Permittee shall pay annual fees to IDEM, OAM, and Anderson Office of Air Management, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

**Response to Comment 13:**

IDEM has determined that the current language in condition B.26 sufficiently states the requirements for the payment of fees and therefore the requested modification to B.26 (a) is not necessary. No changes have been made as a result of this comment.

**Comment 14:**

It is requested that Condition B.26 (b) be modified as follows (bold language should be added, language with a line through it should be removed):

**B.26** Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (b) Failure to pay may result in administrative enforcement action, ~~or revocation of this permit.~~

**Response to Comment 14:**

The language found in this condition is taken from 326 IAC 2-7-19. No changes have been made as a result of this comment.

**Comment 15:**

It is requested that Condition B.27, Credible Evidence be revised.

**Response to Comment 15:**

IDEM now believes that this condition is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

~~B.27 — Credible Evidence [326 IAC 2-7-5(3)] [62 Federal Register 8313] [326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to establish compliance or noncompliance.~~

**Comment 16:**

It is requested that Condition C.7 be modified as follows (bold language should be added, language with a line through it should be removed):

~~C.7 Operation of Equipment [326 IAC 2-7-6(6)]~~

~~All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation~~ **to the extent required by applicable law.**

**Response to Comment 16:**

IDEM does not have the authority nor the intention to enforce non-applicable laws. Therefore, no changes have been made as a result of this comment.

**Comment 17:**

It is requested that the typographical error found in Condition C.9(d) be corrected.

**Response to Comment 17:**

The typographical error found in Section C, Conditions C.9(d) was corrected to read as follows (bolded language has been added, the language with a line through it has been removed):

~~C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]~~

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. ~~Box~~ **Box** 2100,  
120 E 8th Street, Anderson, Indiana, 46018

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Comment 18:**

It is requested that Condition C.12 be modified as follows (bold language should be added, language with a line through it should be removed):

**C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit **or by such other date as shall be agreed to by IDEM**. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

**Response to Comment 18:**

IDEM has determined that the current language specifying the time frame is sufficient. The requested language has not been added.

**Comment 19:**

It is requested that Condition C.14 be modified as follows (bold language should be added, language with a line through it should be removed):

**C.14 Monitoring Methods [326 IAC 3]**

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed, according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit **or as approved in writing by IDEM**.

**Response to Comment 19:**

IDEM does not believe that the requested change to the language is necessary and the condition will remain unchanged. Although it is not stated in the permit, the source can still submit a written request to IDEM, OAM prior to monitoring or testing and IDEM, OAM will evaluate the request.

**Comment 20:**

Condition C.16(b) states that the emergency reduction plans (ERPs) shall be submitted for approval "within ninety (90) days after the issuance of this permit." It is requested that the submittal date be extended to one hundred eighty (180) days after the issuance of the permit.

**Response to Comment 20:**

IDEM considers the 90 day period sufficient time to develop and submit an ERP. IDEM allows a time period of 180 days for the ERP submittal for new sources only. No changes have been made as a result of this comment.

**Comment 21:**

It is requested that Condition C.17, Risk Management Plan, be removed since the facility does not have any operations subject to these regulatory programs.

**Response to Comment 21:**

The Risk Management Plan provision does not state that the Permittee has more than the threshold quantity of a regulated substance. The provision may be applicable if the Permittee does meet the threshold at some time in the future. The condition remains in the permit.

**Comment 22:**

It is requested that Condition C.18(a)(5) and C.18(b), regarding the Compliance Response Plan, be removed from the permit because ABC Rail believes that the requirement to develop a compliance response plan may be beyond the authority given to IDEM under applicable law.

**Response to Comment 22:**

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan(PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to included a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the permittee may know from experience, what replacement parts should be kept on hand. The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance. There are no changes in the condition.

**Comment 23:**

It is requested that the typographical error found in Condition C.21(a) be corrected.

**Response to Comment 23:**

The typographical error found in Section C, Condition C.21(a) was corrected to read as follows (bolded language has been added, the language with a line through it has been removed):

**C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

---

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, ~~all~~ **At** observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

**Comment 24:**

It is requested that in Section C, Condition C.23(a) and 23 (d), General Reporting Requirements, the reporting requirements be changed from Quarterly to Biannually.

**Response to Comment 24:**

Since the source is not required to submit any quarterly sampling reports, OAM will change the reporting requirements to semi-annual (OAM will not change it to biannually since that means every two years). Conditions C.23 (a) and C.23 (d) of the permit are changed as follows (bolded language has been added, the language with a line through it has been removed):

**C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

---

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a **Semi-annual** ~~Quarterly~~ Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- and
- Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Anderson Office of Air Management on or before the date it is due.
- (d) Unless otherwise specified in this permit, any **semi-annual** ~~quarterly~~ report shall be submitted within thirty (30) days of the end of the reporting period.

**Comment 25:**

It is requested that Condition C.24, Compliance with 40 CFR 82 and 326 IAC 22-1, be removed since the facility does not have any operations subject to these regulatory programs.

**Response to Comment 25:**

The U.S. EPA has requested that this condition be in every Title V permit. 40 CFR 82 regulates the handling of ozone-depleting substances, such as Freon, in a variety of processes and products including domestic and commercial refrigeration and air-conditioning units and portable fire extinguishers. Most sources include one or more subject units. Maintenance or repair of such units has the potential to release substances controlled under these rules. The condition remains unchanged.

**Comment 26:**

It is requested that Section D, Conditions D.1.3(a) and (b) be modified as follows (bold language should be added, language with a line through it should be removed):

**D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**

- a) During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM, PM-10 and CO testing for the electric arc furnace BH-7, utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM, Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, Method 10 (40 CFR 60, Appendix A) for CO or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. In addition to these requirements, IDEM may require compliance testing ~~when necessary to determine if the facility is in compliance to~~ **the extent authorized by applicable law.**
- b) Except for the electric arc furnace BH-7, the Permittee is not required to test the rest of the facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if any of the facilities are in compliance **to the extent authorized by applicable law.** If testing is required by IDEM, compliance with the PM and PM10 limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**Response to Comment 26:**

IDEM does not have the authority nor the intention to enforce non-applicable laws. Therefore, no changes have been made as a result of this comment.

**Comment 27:**

Typographical errors and clarifications were noted in Section D, Conditions 1.4 and 1.9(a).

**Response to Comment 27:**

The typographical errors found in Section D, Conditions 1.4 and 1.9(a) were corrected to read as follows (bolded language has been added, the language with a line through it has been removed):

**D.1.4 Particulate Matter (PM)**

The baghouse for PM control shall be in operation at all times when the facilities BH-1, BH3 through BH-8 are in operation. ~~two (2) paint booths (PB<sub>1</sub> and PB<sub>2</sub>) are in operation).~~

**D.1.9 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations for each of the following stack ~~exhausts exhausts:~~ **exhausts** BH-1, BH-3, BH-4, BH-7, and BH-8.

**Comment 28:**

It is requested that in Condition D.1.5 (a), Visible Emissions Notations, the visible emission notations of each of the facility stacks be changed from daily to weekly. Likewise, on page 10 of the TSD, the Visible Emissions Notations section should be revised to reflect any changes.

**Response to Comment 28:**

OAM believes that daily visible emissions notations are necessary to insure that the Permittee remains in compliance. No changes have been made to this condition in the final permit.

**Comment 29:**

It is requested that Section D, Condition D.1.6(e) be modified as follows (bold language should be added, language with a line through it should be removed):

**D.1.6 Baghouse Inspections**

---

An inspection shall be performed each calendar quarter of all bags controlling the following operations:

- (a) the grinding and cutting booth, identified as BH-1
- (b) the sand reclamation, identified as BH-3
- (c) the shakeout machine, identified as BH-4
- (d) the electric arc furnace, identified as BH-7
- (e) the shot blasting machine, identified as BH-8

~~A baghouse inspection shall be performed every three months.~~ Inspections are optional when venting to the indoors. All defective bags shall be replaced.

**Response to Comment 29:**

The condition shall be changed as follows:

**D.1.6 Baghouse Inspections**

---

An inspection shall be performed each calendar quarter of all bags controlling the following operations:

- (a) the grinding and cutting booth, identified as BH-1
- (b) the sand reclamation, identified as BH-3
- (c) the shakeout machine, identified as BH-4
- (d) the electric arc furnace, identified as BH-7
- (e) the shot blasting machine, identified as BH-8

A baghouse inspection shall be performed ~~every~~ **within** three months **of redirecting vents to the atmosphere and every three months thereafter**. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

The OAM prefers that the TSD reflect the permit that was on public notice. Changes to the technical support material that occur after the public notice are documented in the Addendum to the TSD. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

It is noted in this Addendum to the TSD that BH-5 and BH-6 are not required and therefore parametric monitoring is not required.

**Comment 30:**

It is requested that Condition D 1.8, Parametric Monitoring, be removed since ABC Rail will perform the visible emissions notation as required by Condition D.1.5. The visible emissions notation should provide a sufficient indication if the baghouses are operating normally.



Finally, even if Condition D.1.8 is included in the permit, it should not require parametric monitoring for BH-5 and BH-6 since these units are not required to use a baghouse, as acknowledged on pages 7 and 8 of the TSD. Likewise, on page 10 of the TSD, the Parametric Monitoring section should be revised to reflect any changes.

**Response to Comment 30:**

The requirement to perform visible emissions notations is not a sufficient indication if the baghouses are operating properly and therefore parametric monitoring is required. However, parametric monitoring will not be required for BH-5 and BH-6 since these units are not required to use a baghouse to be in compliance. The condition has been changed as follows:

**D.1.8 Parametric Monitoring**

---

The Permittee shall record the total static pressure drop across each of the baghouses BH-1, BH-3, BH-4, ~~BH-5, BH-6~~, BH-7, and BH-8 used in conjunction with the associated processes, once daily when the processes controlled by these baghouses are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and Anderson Office of Air Management and shall be calibrated at least once every six (6) months.

**Comment 31:**

It is requested that Section D, Conditions D.2.2 be modified as follows (bold language should be added, language with a line through it should be removed):

**D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

---

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance **to the extent authorized by applicable law**. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**Response to Comment 31:**

IDEM does not have the authority nor the intention to enforce non-applicable laws. Therefore, no changes have been made as a result of this comment.

**Comment 32:**

On Page 7 of the Technical Support Document, under section 326 IAC 6-3-2, (c) of the State Rule Applicability, the potential PM emissions from the shakeout machine are incorrect.

**Response to Comment 32:**

The OAM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Please note that the potential particulate matter (PM) emissions from the shakeout machine are 59.4 lb/hr.

### OAM Comments

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been removed). The Table of Contents has been modified to reflect these changes.

#### Change 1:

The zip code for the Anderson Office of Air Management was changed to the correct zip code of 46018 in all applicable sections of the permit and a contact phone number was added.

#### Change 2:

**A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]**

The Permittee owns and operates a stationary steel foundry that manufactures track components.

Responsible Official: D. Chisholm McDonald  
Source Address: 705 East School Street, Anderson, Indiana 46012  
Mailing Address: 705 East School Street, Anderson, Indiana 46012  
**Phone Number: 765-642-4991**  
SIC Code: 3325  
County Location: Madison  
County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program  
Major Source, under PSD ~~or Emission Offset Rules~~;  
Major Source, Section 112 of the Clean Air Act

#### Change 3:

The phone and fax numbers for the Anderson Office of Air Management were corrected in Section B. 13 (4).

#### Change 4:

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**

- (a) **Where specifically designated by this permit or required by an applicable requirement, any** Any application forms, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

#### Change 5:

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

Section B.12 (a) has been modified as follows (bold language has been added, language with a line through it has been removed):

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

---

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

**in writing, prior to the end of the ninetieth (90th) day, with full justification of the reasons for the inability to meet this date, certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

**Change 6:**

- B.13 **(Emergency Provisions)** the rule cite in paragraph (e) has been revised to reflect the new Article 2 rule.

B.13 Emergency Provisions [326 IAC 2-7-16]

---

- (e) IDEM, OAM, **Anderson Office of Air Management** may require that the Preventive Maintenance Plans required under 326 IAC ~~2-7-4-(e)(9)~~ **2-7-4(c)(10)** be revised in response to an emergency.

**Change 7:**

- B.14 **(Permit Shield)** the rule cite in paragraph (h) has been revised to reflect the new Article 2 rule.

B.14 Permit Shield [326 IAC 2-7-15]

---

- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, **Anderson Office of Air Management** has issued the modification. [326 IAC ~~2-7-12(b)(8)~~ **2-7-12(b)(7)**]

**Change 8:**

**B.18(b)(1)(B) (Permit Renewal)** 326 IAC 2-5 has been repealed.

B.18 Permit Renewal [326 IAC 2-7-4]

---

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, or **Anderson Office of Air Management**, on or before the date it is due. ~~[326 IAC 2-5-3]~~

**Change 9:**

**B.25 (Transfer of Ownership or Operation)** 326 IAC 2-1 has been repealed therefore this condition has been modified.

~~B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]~~  
~~Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:~~

---

- ~~(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch **Anderson Office of Air Management**, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.~~
- ~~(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(c) IDEM, OAM, **Anderson Office of Air Management** shall reserve the right to issue a new permit.~~

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

---

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**Change 10:**

**B.26 (Annual Fee Payment)** has been revised to show that the source may receive a bill from IDEM or the local agency. For Title V sources IDEM will always send a bill and there are some local agencies that will send a bill as well.

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

---

- (a) The Permittee shall pay annual fees to IDEM, OAM, and Anderson Office of Air Management, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, **or Anderson Office of Air Management**, the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

**Change 11:**

**C.3 Opacity [326 IAC 5-1]**

Condition C.3 has been revised to reflect current rule language. The condition has been changed to:

**C.3 Opacity [326 IAC 5-1]**

---

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions Opacity~~ shall not exceed an average of forty percent (40%) ~~opacity in twenty-four (24) consecutive readings; any one (1) six (6) minute averaging period~~ as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions Opacity~~ shall not exceed sixty percent (60%) ~~opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings)-as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor)~~ in a six (6) hour period.

**Change 12:**

**C.11 (Performance Testing)** has been revised to show that the local agency should also be receiving the test reports.

**C.11 Performance Testing [326 IAC 3-6]**

---

- (b) All test reports must be received by IDEM, OAM **and Anderson Office of Air Management**, within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a

reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Change 13:**

**C.13 (Compliance Monitoring)** has been modified as follows to correct a grammatical mistake.

**C.13 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

---

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend **the** compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100,  
120 E 8th Street, Anderson, Indiana, 46018

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Change 14:**

**C.14 (Maintenance of Monitoring Equipment)** has had a second option added specifically for COM's.

**C.14 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

---

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. In the case of continuous opacity monitoring, whenever the continuous opacity monitor is malfunctioning or will be down for repairs or adjustments for a period of four (4) hours or more, visible emission observations should be performed for a minimum of one (1) hour, as described in section D, and should be implemented at least once per daylight shift during process operations, until such time that the continuous opacity monitor is back in operation. The VE readings during this period shall be reported to the air compliance inspector.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

### Change 15:

#### D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

---

- a) During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM **and** PM-10 ~~and CO~~ testing for the electric arc furnace BH-7, utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM **and** Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, ~~Method 10 (40 CFR 60, Appendix A) for CO~~ or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.
- b) Except for the electric arc furnace BH-7, the Permittee is not required to test the rest of the facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if any of the facilities are in compliance. If testing is required by IDEM, compliance with the PM and PM10 limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### Change 16:

#### D.1.7 Broken or Failed Bag Detection

The condition has been revised as follows:

#### D.1.7 Broken or Failed Bag Detection

---

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~ **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**